

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : Docket No. 17 CR 372 (JS)
:
Plaintiff, :
:
- against - :
:
MICHAEL WATTS :
Defendants. :
:
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MICHAEL WATTS PROPOSED VOIRE DIRE QUESTIONS

Defendant Michael Watts respectfully requests the Court to include the following interrogations of prospective jurors pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, in addition to those questions customarily propounded by the Court to the panel:

1. Have any of you, members of your family or close friends ever watched and/or discussed the following movies:

The Wolf of Wall Street (2013)

Wall Street: Money Never Sleeps (2010)

Boiler Room (2000)

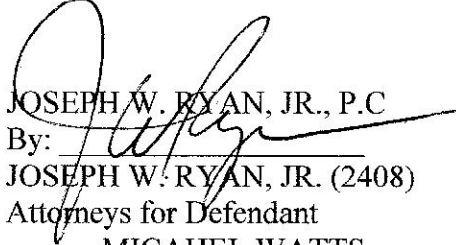
Wall Street (1987)

2. Have any of you, members of your family or close friends ever been employed in the financial industry? Or the marketing world, such as advertising agencies or public relations firms?

3. Have any of you, members of your family or close friends ever been employed in the accounting profession?
4. Have any of you, members of your family or close friends ever been adversely affected by financial investments in securities or other forms of investment?
5. Have any of you, members of your family or close friends ever been in bankruptcy?
6. Can you share with us the person you most admire and why?
7. Have any of you, members of your family or close friends read or heard about any case that involved the financial industry or investments in the stock market?
8. Have you ever relied on the advice of investment or financial advisors when making decisions about your money?

Dated: October 2, 2019
Melville, NY 11747

Respectfully submitted,


JOSEPH W. RYAN, JR., P.C.
By: _____
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